

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION AT CLEVELAND**

John Doe 1,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:22-cv-02139-PAB
)	
Varsity Brands, LLC; Varsity Spirit, LLC;)	JUDGE PAMELA A. BARKER
Varsity Brands Holding Company, Inc.; U.S.)	
All Star Federation, Inc. d/b/a U.S. All Star)	
Federation; USA Federation of Sport Cheering)	
d/b/a USA Cheer; Charlesbank Capital)	
Partners, LP; Bain Capital, LP; Jeff Webb,)	
individually; Taji Davis; Brandon Hale; and)	
ShowPro Choreography,)	
)	
Defendants.)	

JOINT STATUS REPORT

Pursuant to the Court's June 26, 2024 order, the remaining parties, except for defaulting Defendant Hale, submit the following joint status report.

The parties are close to finalizing settlement. Specifically, Plaintiff's case is one of many similar cases, many of which required court approval since the settlements involve minors. Since the last status report, nearly all of those minor settlements have been resolved. The parties are diligently waiting for a final hearing date and approval of one more minor settlement. Accordingly, the parties respectfully request that this Court continue to stay all proceedings in this matter.

A copy of this Joint Status Report will be sent to Defendant Hale at the address on file.

Respectfully submitted,

/s/ Abigail F. Chin

Charles H. Cooper, Jr. (0037295)
Rex H. Elliott (0054054)
Abigail F. Chin (0097928)
COOPER ELLIOTT
305 West Nationwide Boulevard
Columbus, Ohio 43215
(614) 481-6000
(614) 481-6001 (Facsimile)
chipc@cooperelliott.com
rexe@cooperelliott.com
abbyc@cooperelliott.com

/s/ Michael T. Conway (per telephone

authority 9/16/2024)
Michael T. Conway (0058413)
Michael T. Conway and Company
3456 Sandlewood Drive
Brunswick, Ohio 44212
Xray2Alpha@aol.com

Attorney for Defendant

Taji Davis

Bakari T. Sellers, SC Fed. ID No. 11099*
Joseph Preston Strom, SC Fed. ID No. 4354*
Mario A. Pacella, SC Fed. ID No. 7538*
Amy E. Willbanks, SC Fed. ID No. 13537*
Jessica L. Fickling, SC Fed. ID No. 11403*
Alexandra Benevento, SC Fed. ID No. 10734*
STROM LAW FIRM
6923 N. Trenholm Road, Suite 200
Columbia, South Carolina 29206
(803) 252-4800
(803) 252-4801 (Facsimile)
Email: bsellers@stromlaw.com
petestrom@stromlaw.com
mpacella@stromlaw.com
awillbanks@stromlaw.com
jfickling@stromlaw.com
abenevento@stromlaw.com

*Admitted Pro Hac Vice

Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Joint Status Report was served on the following party of record, by ordinary U.S. mail, postage prepaid, this 17th day of September, 2024:

Brandon Hale
3607 McCuiston Road
Apartment 34
Greensboro, North Carolina 27407

/s/ Abigail F. Chin _____